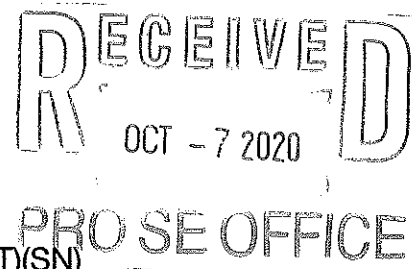


UNITED STATES DISTRICT COURT.
SOUTHERN District Of New York
EMMANUEL A. ADIGUN
Plaintiff

JUDGE ANALISA TORRES



Case# 1-20-cv-03676(AT)(SN)

IRS and SSA and others.
Defendants

NOTICE OF MOTION TO
SANCTION PNCA FOR FLAGRANT
DISOBEDIENCE OF COURT ORDERS.

Please take notice that Plaintiff, Emmanuel A. Adigun, hereby moves before the
Honorable ANALISA TORRES, United States District Court Judge for the Southern
District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500
Pearl Street, New York, New York 10007, for entry of this Court to sanction
Premiere Credit of North America for the following reasons:

a). That, Premiere Credit of North America, a defendant in this case, cavalierly
violated

this Court's order stating that "defendant shall file its motion to dismiss by

September 8, 2020" as per Order number 17 of August 4, 2020;

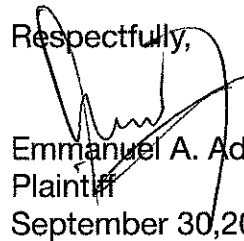
b). That, Premiere Credit of North America violated Rule 4 of Federal Rules of Civil
Procedure;

c). That, Plaintiff served Premiere Credit of North America four different occasions
at different addresses unsuccessfully. The last service was at the guidance of
this Honorable Court

d). That, even though DOJ claimed " improper service in its last motion to dismiss
Plaintiff's OTSC nevertheless, it met the September 8, 2020 deadline pursuant
to Rule iv(a). Why not Premiere Credit of North America?

Plaintiff hereby respectfully submit to this Honorable Court
to implement appropriate civil contempt sanctions with no additional motion or
hearing authorized. See *Id.*; cf. *Lamborghini-Ortiz v. Ortiz-Velez*, 630 F.
3D.228,246 (1st.Cir.2010).

Respectfully,



Emmanuel A. Adigun
Plaintiff
September 30, 2020